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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 Case No. 2:18-cv-02078-KJD-VCF

15 BRANDI CZERNIEWSKI, individually, as
16 Personal Representative of the Estate of Bruce
17 Schepens, as Trustee of the Bruce Schepens
18 Revocable Trust, and as Trustee of the Bruce
19 Schepens Separate Property Trust,

20 Plaintiff,

21 v.

22 KRISTINE KEPPEL, an individual, and
23 TD AMERITRADE, INC., a Foreign Corporation,
24 Defendants.

25 **STIPULATION AND ORDER TO**
26 **STAY PENDING ARBITRATION**

27 Defendant TD Ameritrade, Inc. ("TD Ameritrade"), and plaintiff Brandi Czerniewski,
28 individually, as Personal Representative of the Estate of Bruce Schepens, as Trustee of the
Bruce Schepens Revocable Trust, and as Trustee of the Bruce Schepens Separate Property Trust
("plaintiff"), collectively referred to as the "parties," by and through their respective
undersigned counsel, hereby stipulate and agree as follows:

29 **IT IS HEREBY STIPULATED** that a Judgment was entered in this proceeding against
30 defendant Keppel on March 30, 2021;

31 **IT IS FURTHER STIPULATED** that plaintiff's claims against defendant TD
32 Ameritrade will proceed to arbitration through the Financial Institution Regulatory Authority

1 (“FINRA”), and pursuant to the provisions of the Federal Arbitration Act, 9 U.S.C. § 1 *et. seq.*
2 (the “FAA”);

3 **IT IS FURTHER STIPULATED** that plaintiff’s claims against TD Ameritrade in this
4 proceeding shall be stayed pending resolution of the arbitration through FINRA pursuant to the
5 provisions of the FAA; and

6 **IT IS FURTHER STIPULATED** that all statutes of limitation and statutes of repose
7 applicable to all claims and potential claims by all parties against defendant TD Ameritrade that
8 arise out of the allegations in the plaintiff’s complaint, including, without limitation, direct
9 claims, counter-claims, and cross-claims, are tolled during such stay.
10

11 Dated this 31st day of January, 2022.

Dated this 31st day of January, 2022.

12 HUTCHISON & STEFFEN, PLLC

SOLOMON DWIGGINS & FREER, LTD.

13 /s/ Joseph R. Ganley

/s/ Ross E. Evans

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19
20 **ORDER**

21 **IT IS SO ORDERED.**

22 Dated this 4th day of February, 2022.

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25 DISTRICT COURT JUDGE KENT J. DAWSON

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1 Respectfully submitted by:

2 HUTCHISON & STEFFEN, PLLC

3 */s/ Joseph R. Ganley*

4 _____
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